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VIA Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**RE: Expression of Interest
Next Generation Network Experiments in Rural America
Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

Pursuant to the *Technology Transitions Order*,¹ Atlantic Telecom Multimedia Consolidated, LLC, ("ATMC") hereby submits this expression of interest to deploy robust, scalable broadband to unserved, high-cost rural areas as part of the Federal Communications Commission ("FCC" or "Commission") Next Generation Network Experiments in Rural America Program (the "Program").

I. Project Overview and Introduction

ATMC is a competitive local exchange carrier ("CLEC"). It provides voice, broadband, and video services in Brunswick County and Columbus County, North Carolina.

ATMC is a wholly-owned subsidiary of Atlantic Telephone Membership Corporation ("Atlantic Telephone"), an incumbent local exchange carrier in Shallotte, North Carolina. Atlantic Telephone provides voice, broadband, wireless and video services to customers in Brunswick County, North Carolina. Atlantic Telephone also is a recipient of a Broadband Initiatives Program ("BIP") award in Columbus County, and currently is deploying broadband facilities pursuant to that award.

As explained in greater detail below, ATMC proposes to deliver broadband to high-cost rural areas by leveraging existing infrastructure and expanding its current fiber optic network and service area. ATMC proposes to offer very high-speed broadband access to customers, including community anchor institutions in the proposed project service area.

¹ *Technology Transitions et al.*, GN Docket No. 13-5 *et al.*, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014) ("*Technology Transitions Order*").

II. Proposed Service Area

Subject to receipt of funding, ATMC proposes to provide broadband to locations in Brunswick County, NC and Columbus County, NC that currently lack Internet access at speeds of 3 Mbps downstream/768 kbps upstream. Specifically, ATMC proposes to serve the unserved locations in the census blocks eligible for funding in the census tracts that are listed on Attachment A. By deploying services in these census blocks, ATMC would make high-speed broadband service available to approximately 700 previously unserved locations.

ATMC proposes to expand its existing network and service area by extending its fiber network into areas in which AT&T or CenturyLink are the incumbent local exchange carriers.

ATMC currently is not designated an eligible telecommunications carrier ("ETC"), however, its parent, Atlantic Telephone, is an ETC. ATMC either intends to seek and obtain ETC designation in the proposed service area, or to partner with Atlantic Telephone as necessary to ensure that support is issued to an authorized ETC.

At this time, ATMC has not identified any community anchor institutions in the proposed service area that lack Internet access at speeds of 3 Mbps downstream/768 kbps upstream. ATMC has already deployed 1Gbps broadband service to all schools in its serving area and is developing its network to offer 10Gbps broadband to all anchor institutions in its service area by 2018.

III. Proposed Technology and Network

ATMC plans to deploy fiber-to-the-premises in the proposed service area. ATMC currently is constructing a fiber network in parts of Brunswick County, NC and Columbus County, NC, and will use the proposed Program support to continue to expand this broadband network into additional rural areas in these counties. This proposed solution is economical because it will provide very high-speed broadband access by leveraging ATMC's existing fiber optic network. This further leverages the BIP award to Atlantic Telephone and efficiently maximizes the benefit of the BIP-funded broadband network. This is an ideal, economical solution for the proposed service because of ATMC's existing network and ability to expand to serve otherwise unserved locations, at broadband speeds that are far beyond the Commission's goals of 4/1 Mbps under Connect America Fund ("CAF") Phase II and speeds that already meet the National Broadband Plan's 2020 goal for downstream speeds.

The network will be scalable and capable of supporting very high-speed broadband service. This will be a network that allows consumers to enjoy the advantages of services offered over broadband today and tomorrow. Consumers can purchase broadband at varying speeds based on their needs as they change.

IV. Proposed Services

ATMC proposes to provide voice, broadband and video services in the proposed service area. ATMC expects to offer a range of speeds from 12 Mbps to 100 Mbps downstream and

from 3 Mbps to 20 Mbps upstream throughout the service area, as well as 1Gbps synchronous broadband service. ATMC contemplates pricing for minimum broadband speeds as low as \$45.

V. Estimated Cost and Deployment Schedule

ATMC anticipates that it will request one-time funding for the project proposed above, but reserves the right to seek ongoing support depending on the rules and policies ultimately adopted for the Program. ATMC estimates that it will request approximately \$6.4 million in support for the proposed project.

Upon award of support, ATMC would make every effort to deploy broadband to unserved areas as quickly as possible. ATMC/Atlantic Telephone was successful in deploying its BIP-funded network well ahead of schedule and would use this experience and the efficiencies learned in that project to carry out any new deployment. At this time, ATMC estimates that the proposed project could be completed within four years from the receipt of support, if not sooner.

VI. Conclusion

The proposed project would provide for the cost-efficient deployment of very high-speed broadband in unserved areas by leveraging existing network infrastructure and extending the benefits from another federal program. ATMC's proposed service vastly exceeds the minimum broadband speeds required under the CAF Phase II program, and would meet the burgeoning data demands of the future. The proposed project would provide the FCC with valuable data about the ability to deploy a very high-speed, robust, scalable broadband network in a rural area.

If you have any questions or would like to discuss the project described in this expression of interest, please contact our FCC counsel, Greg Whiteaker, at greg@hermanwhiteaker.com, 202-600-7274.

Respectfully submitted,



Allen Russ
Chief Executive Officer
Atlantic Telephone Membership Corporation
Managing Member of
Atlantic Telecom Multimedia Consolidated, LLC

ATTACHMENT A

Proposed Census Tracts for ATMC Expression of Interest Next Generation Network Experiments in Rural America *Connect America Fund, WC Docket No. 10-90*

Brunswick County, North Carolina

Census Tract

37019020101
37019020102
37019020103
37019020202
37019020602

Columbus County, North Carolina

Census Tract

37047930100
37047930200
37047930300
37047930400
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37047931000
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